

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

THE STATE OF LOUISIANA, By and through its ) Civil Case Action No.: 3:24-cv-00563  
Attorney General, Elizabeth B. Murrill; )  
*et al* )  
PLAINTIFFS )  
 )  
V. ) Chief Judge: Terry A. Doughty  
 )  
U.S. DEPARTMENT OF EDUCATION; MIGUEL )  
CARDONA, in his official capacity as )  
Secretary of Education; *et al* ) Magistrate Judge: Kayla D. McClusky  
DEFENDANTS )

**MOTION TO APPEAR PRO HAC VICE**

In accordance with the local rules for the United States District Court, Western District of Louisiana, application is made on behalf of KATHERINE I. HARTLEY, Idaho State Bar No. 11837, to be admitted pro hac vice to the bar of this court for the purpose of intervening and appearing on behalf of Pacific Justice Institute in the above described action.

- I am ineligible to become a member of this court, but I am a member in good standing of the bar of the Idaho State Bar defined by Idaho Bar Commission. Attached hereto is a certificate of good standing from such court.
- Payment of the applicable fee of \$105.00 is made via the court's electronic filing system using Pay.gov.
- There have been no disciplinary proceedings or criminal charges instituted against me.
- In accordance with the local rules for the United States District Court, Western District of Louisiana, Mark A. Perkins of the firm of Perkins & Associates, LLC is appointed as local counsel.
- I authorize the Clerk of Court for the Western District of Louisiana to transmit notice of entries of judgments and orders to me under Fed.R.Civ.P. 77, Fed.R.Cr.P. 49, LR 5.7.10. I also agree to receive notice electronically from other parties and the court via electronic mail. I understand that electronic mail filter software (SPAM filer) may interfere with receipt of e-mail notices and have verified that any such software installed on my computer or network will

not filter our messages sent from Clerk@lawd.uscourts.gov. I understand this electronic notice will be in lieu of notice by any other means. I understand it is my responsibility to advise the Clerk's Office promptly in writing of any physical address changes and/or update my electronic mail address within the court's electronic filing system.

Respectfully submitted,  
PACIFIC JUSTICE INSTITUTE

By: /s/Katherine I. Hartley  
Katherine I. Hartley  
Idaho State Bar No.: 11837

Pacific Justice Institute  
PO Box 2131  
Coeur d'Alene, ID 83816  
Email: Khartley@pji.org

Respectfully submitted,  
PERKINS & ASSOCIATES, LLC

By: /s/ Mark A. Perkins  
Mark A. Perkins (Bar No. 18529)

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**Certificate of Service**

I hereby certify that on June 20, 2024, I presented the foregoing Petition for Admission Pro Hac Vice to the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to the following: THE STATE OF LOUISIANA, by and through its Attorney General, Elizabeth B. Murrill; LOUISIANA DEPARTMENT OF EDUCATION; THE STATE OF MISSISSIPPI, by and through its Attorney General, Lynn Fitch; THE STATE OF MONTANA, by and through its Attorney General, Austin Knudsen; THE STATE OF IDAHO, by and through its Attorney General, Raul Labrador; U.S. DEPARTMENT OF EDUCATION; MIGUEL CARDONA, in his official capacity as Secretary of Education; U.S. DEPARTMENT OF EDUCATION'S OFFICE FOR CIVIL RIGHTS; CATHERINE LAMON, in her official capacity as the Assistant Secretary for Civil Rights; U.S. DEPARTMENT OF JUSTICE; MERRICK B. GARLAND, in his official capacity as the Attorney General of the United States.

Respectfully submitted,

PERKINS & ASSOCIATES, LLC

By: /s/ Mark A. Perkins  
Mark A. Perkins (Bar No. 18529)

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Local Counsel